

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

JAMES SANMATEO,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:11-cv-840
)	
FRIEDMAN & MACFADYEN, P.A.,)	
et al.,)	
)	
Defendants.)	

CONSENT MOTION TO STAY

Pursuant to Federal Rules of Civil Procedure 16(c)(2), the Defendants move, with the consent of the Plaintiff, that discovery and merits litigation in the above action be stayed to permit the Parties the opportunity to engage fully in mediation through a private mediator (under the Court's supervision). Because the Defendants' current extension to file responsive pleadings expires on January 26, 2012, the Parties respectfully request the Court's consideration of this consent motion before then.

Respectfully Submitted,

**FRIEDMAN & MACFADYEN, P.A.,
F&M SERVICES, L.C., JOHNIE R. MUNCY**

By Counsel

/s/ Andrew Biondi

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of January, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

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